

Origin: E&E Website  
Date: 12/16/2004  
First Name: Carol  
Last Name: Nicolas  
Address: 5067 Ciardi Ct.  
City: CarlsBad  
State: CA  
Zip Code: 92008  
Topic: Alternatives  
Comments: In the draft I read that an onshore site study has been going on since 1978. I would like to argue that to the people who think the Cabrillo Port Project has not been studied long enough. I believe that BHP Billiton is doing its very best in resolving unanswered questions and covering all the bases of study.

G057-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website  
Date: 12/17/2004  
First Name: Danny  
Last Name: Nicolas  
Address: 5001 W Florida Ave. # 40  
City: Hemet  
State: CA  
Zip Code: 92545  
Topic: Other/General Comment  
Comments: The California Energy Commission estimates that demand for all uses of natural gas will grow by one percent annually over the next ten years. According to the CEC, the proposed Project could supply approximately 13 percent of California's average daily needs.  
  
With this knowledge I can't understand why more California residence aren't for this.  
We should thank BHP Billiton for coming to us with the answers to our Natural gas Problems.

G148-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website  
Date: 12/16/2004  
First Name: Sam  
Last Name: Nicolas  
Address: 5001 W Florida Ave. # 40  
City: Hemet  
State: CA  
Zip Code: 92545  
Topic: Recreation  
Comments: Recreation will not be disturbed enough to prevent this money, air and life saving project. I am for this project and want to thank the BHP Billiton and all those involved for finding a solution.

G047-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website  
Date: 12/17/2004  
First Name: Sam  
Last Name: Nicolas II  
Address: 5067 Ciardi Ct.  
City: CarlsBad  
State: CA  
Zip Code: 92008  
Topic: Other/General Comment

Comments: I have heard complaints about the Port being off shore. I would like to argue that there are on shore ports in I believe Japan that have been working for years with out fatal incident. If people keep complaining about the Port being off shore the people may get it moved on shore. I feel that BHP Billitin has done the proper research, and they have our best entrusts at mind while planning this project.

G151-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website  
Date: 12/17/2004  
First Name: Sam  
Last Name: Nicolas III  
Address: 5001 W Florida Ave. # 40  
City: Hemet  
State: CA  
Zip Code: 92545  
Topic: Other/General Comment  
Comments: The need for the Cabrillo Prot Project is great.  
We need to increase the natural gas supply in the United States as well  
as California; we also need to increase natural gas supply reliability and  
diversity. This project takes care of those needs.  
I would like to make it very clear that I am for this project!!

G150-1

Your statement is included in the public record and will be taken  
into account by decision-makers when they consider the proposed  
Project.

Origin: E&E Website  
 Date: 12/20/2004  
 First Name: thomas  
 Last Name: nielsen  
 Title: resident  
 Address: 1411 martin luther king dr  
 City: oxnard  
 State: CA  
 Zip Code: 93030  
 Phone No.: 805-236-7790  
 Email: tnie1809@adelphia.net  
 Topic: Public Safety: Hazards and Risk Analysis

**G328****Comments:**

I have two areas of interest and concern – potential visual impacts and NBVC sea test range operations.

I am concerned that the potential visual impacts of the project are adequately addressed.

1. Introducing the BHP project will result in the creation of a new industrial feature on our Pacific Coastline. Unlike the Santa Barbara Channel and the area offshore of LA and Long Beach Harbors, the (BHP) proposed project area does not have any existing industrial activity. Many of the views of this facility will be from elevated sites along the Malibu coastline and inland areas, which will increase the facility's visibility. I believe Coastal policies say that new industrial facilities should (if possible) be located in areas where industrial facilities are already located so that impacts to visual and coastal resources are reduced. If this is the case, introducing this project in this area would create a significant visual impact. The DEIR should more adequately address this.

1

2. The proposed storage tank at the new Ormond Beach receiving facility and a new gas metering station. It seem the DEIR should include more discussion about the possible visual impacts of these two new, industrial structures as well as associated additional equipment in this sensitive coastal area and should therefore have a more detailed analysis of the issue. It also seems including additional photo simulations would be helpful for the public to review and comment on.

2

There are also a couple issues regarding the NBVC sea test range because the project's sub sea natural gas pipeline route is proposed to cross parts of the Range.

1. The DEIR identifies the possibility of an "errant missile" or over flight from Pt. Mugu entering into the area where the natural gas pipeline will be built. Therefore it seems the BHP project is potentially in harms way because of sea test range activities, both during construction and over the life of the project. It seems more mitigations for possible impacts to the sea test range activities would be required than just the proposed "communications" with the Navy. While basic safety and coordination communication are obviously important, a level of backup communication should be put in place to ensure that an accident or 'near accident' will not occur.

3

2. It isn't clear what will happen if the Navy is using the sea test range when an LNG tanker is coming into or leaving the BHP site. It's implied that LNG activities may need to stop during military activities, but there are no specific restrictions, only the requirement to "communicate" with the Navy. The DEIR should address in greater detail how possible conflicts between LNG and military activities would be resolved, and it should also give the public access to documents that describe how this possible conflicts will be resolved.

4

**G328-1**

Section 4.4.1.2 and Section 4.4.4 under Impact AES-1 address this topic. Appendix F contains additional simulations prepared for viewpoints at elevated sites along the Malibu coastline and inland areas.

**G328-2**

The Project has been modified since issuance of the October 2004 Draft EIS/EIR, and the main odorant station has been relocated to the FSRU with a smaller backup odorant facility onshore. Sections 2.4.1.3, 4.2.7, 4.7.4, 4.12, 4.18.4, 6.2.2, and 6.2.3 contain updated text on this topic.

**G328-3**

Table 4.2-2 identifies representative hazards and threats considered in the public safety analysis. Section 4.3.4 contains revised text and additional information on this topic. Section 4.3.1.4 contains information on marine traffic safety measures.

**G328-4**

Impact MT-6 in Section 4.3.4 addresses potential conflicts in the Point Mugu Sea Range and the SOCAL Range Complex. The Navy has indicated that if the mitigation measures for Impact MT-6 are implemented, the impact would be reduced below its significance criteria. Transiting LNG carriers would not be expected to enter any areas in which the Navy is conducting exercises.

Origin: E&E Website  
 Date: 12/19/2004  
 First Name: danusia  
 Last Name: niklewicz  
 Topic: Air Quality, Alternatives, Biological Resources - Marine, Cumulative Impacts Analysis, Energy and Minerals, Environmental Justice, Hazardous Materials, Marine Traffic, Noise, Public Safety: Hazards and Risk Analysis, Socioeconomics, Water Quality and Sediments, Other/General Comment

## Comments:

## G206

Say NO to this LNG project.

1. It WILL change our horizon
2. It WILL effect the ecology of sea and shore
3. It WILL affect the passage of whales, sharks and other aquatic life.
4. This project IS a hazard to the homes and human lives.
5. There has NOT been enough testing to prove this project is safe.
6. If several years down the line of impact studies find that this LNG had affected the land and sea, life and living, it will be too late to reverse the damage.
7. We do NOT want to be the testing grounds for this project.
8. This LNG WILL be a potential terrorist target.
9. This project WILL increase pollution.
10. California is NOT increasing their demand of new fuel sources.
11. Californians are conservationists and seek ecological alternatives.
12. This LNG has NO benefit to Californians.
13. This project is driven by money and the potential benefits will be realized only in Australia.

In the 2 inch thick LNG report its hard finding detailed info on the environmental concerns of this community. In Malibu, we have chosen, at great expense, to live in this coastal area not just for the zip code. We toast the sunsets; stop to watch schools of dolphins swim by, utilize the state and national parks and beaches to walk, hike, exercise, paddle, swim, surf, ride, bike, and breathe; we give thanks at the breathtaking vistas, celebrate Chumash powwows, pay homage to migratory passing of the pregnant whales at home and at festivals, study the tide pools and have banned smoking on our beaches.

The Monterey Bay Aquarium comes here study sharks. The area that the LNG is proposed, is a spawning ground for sharks. Sharks live near the islands. How can a project proceed without a detailed environ. impact study to reveal the irreversible effects on the delicate ecological balance of these living creatures?

Are we willing to sacrifice the survival of whales, sharks, and countless other aquatic and fowl to the noise in the water, the smog from the ships, leaching of hull metals in the water by docked ships and their oil seepage disrupts the natural balance? With no other model to track such impact, we are NOT willing to be a testing ground or cash cow for a foreign country. Our need for energy would be more efficiently met if the tax incentives for hybrid vehicles, solar power and other existing conservation measures would be restored.

The visibility of this barge is greatly misrepresented in the report, all the hazy images taken are in conditions that occur at only 5-6 months of the year. The rest of the time the horizon is visible past the shipping lanes from sea level and up the hills where homes are too. Presently, increased cargo ship travel is very visible with big plumes of smoke. The LNG barge will be even more visible as ships dock to it, even at night with distracting lights disrupting the dark horizon.

Homeland security is ignored by placing a natural gas time bomb, just waiting for a sail-by suicide bomber with shoulder held rocket launcher to test its range of devastation, blowing up Malibu's coastline. Coincidental that a state & county most vocal nationally about it's political views is the location of this untested barge and that the governor that supports this project has moved his family away from this area where they have lived for years. There is big money behind this project, unsubstantiated claims of payoffs keeping it alive. Why, when California consumption is coming down? There is alternate means of established power of no risk to human or animal life. Keep our money in our state, not funding a foreign corp. Create jobs in restoring old generator power source existing today. There is NO need for this project. After all the cost and damage there will be no perceivable benefit to California. Too many questions unanswered, too many negative factors, too little benefit to proceed. Just say NO. Save our coastline. VOTE NO LNG

## G206-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Section 4.4 contains information on aesthetics. Appendix F provides additional information on the visual analysis and how visibility from various distances was evaluated.

Section 4.7 discusses marine biological resources, and Section 4.7.4 discusses impacts and mitigation.

Section 4.2 and Appendix C contain information on public safety.

1 Sections 2.1 and 4.2.7.3 contain information on design criteria and specifications, final design requirements, and regulations governing the construction of the FSRU and LNG carriers.

Section 5.4 discusses irreversible and irretrievable commitment of resources.

Sections 4.2.2, 4.2.6.1, and 4.2.7.6 contain information on the potential threat of a terrorist attack.

2 The Project has been modified since issuance of the October 2004 Draft EIS/EIR. Section 4.6.1.3 contains a revised discussion of Project emissions and proposed control measures. Section 4.6.4 includes revised mitigation measures. Section 4.18.4 discusses water quality and sediment impacts.

3 Section 1.2.3 addresses natural gas needs in California and has been updated.

Sections 3.3.1 and 3.3.2 address conservation and renewable energy sources as alternatives to the Project within the context of the California Energy Commission's 2005 Integrated Energy Report and other State and Federal energy reports.

Impact ENE-2 in Section 4.10.4 discusses the beneficial impact of the proposed Project on local and regional energy supplies.

5

## G206-2

Table 1.4-1 summarizes the issues raised on the proposed Project during scoping and public comments periods and it identifies the sections within the EIS/EIR where the issues are addressed.

The Monterey Bay Aquarium currently has two shark study programs. One involves tagging and field studies involving juvenile and adult white sharks. The research group tags and releases white sharks netted accidentally in commercial fishing gear for several weeks each summer. The other study involves a long term white shark exhibit where one juvenile white shark (housed at the aquarium since 2004) was tagged, released, and tracked.

Section 4.7.1.2 discusses marine fishes and essential fish habitat (EFH) for fish common to the Project vicinity, including sharks. Impact BioMar-3 in Section 4.7.4 discusses impacts on EFH from construction and mitigation that would be implemented. The proposed Cabrillo Port Project is not expected to have an adverse impact on any shark species or shark habitat. Shark “pupping grounds” are known to occur for many shark species within the Southern California Bight, which extends from Point Conception to the Mexican border and out to the 200-mile limit. Pupping takes place in shallow beaches, bays and estuaries (not offshore) and juveniles generally remain in the coastal zone (less than 200 meter depth). The Channel Islands National Marine Sanctuary is not an isolated or particularly important habitat for shark pupping. The nearest Channel Island to the FSRU is Anacapa Island, which is more than 18 NM away at its closest point, as shown in Figure 2.1-2.

Section 5.4 discusses irreversible and irretrievable commitment of resources.

#### G206-3

Impact BioMar-5 in Section 4.7.4 discusses noise impacts on marine mammals and mitigation. Section 4.6.1.3 contains a revised discussion of Project emissions and proposed control measures. Section 4.6.4 includes revised mitigation measures. Cathodic protection is used to minimizing the impacts of electrolysis on vessel hulls and appurtenances (see Section 4.2.8). Typically cathodic protection is achieved using either anti-corrosion paints or anodes. Anti-corrosion paints would inhibit the leaching of metals from ship hulls, but the use of anodes does result in discharge of metal residue over time as the corrosion occurs with the anodes. The constituents released in the water are the metals used—zinc, aluminum and to a lesser extent platinum. The U.S. Navy has cooperated with the Environmental Protection Agency and the Department of Defense to evaluate discharges from the effects of cathodic protection and have determined that there is “a low potential for causing adverse impacts on the marine environment” (*Phase I Uniform National Discharge Standards for Vessels of the Armed Forces*).



Section 4.18.2 discusses the regulatory setting for water quality and sediments. Table 4.18-8 lists major laws, regulatory requirements, and plans for water quality and sediments. Section 4.18.4 discusses water quality and sediment impacts.

Sections 2.1 and 4.2.7.3 contain information on design criteria and specifications, final design requirements, and regulations governing the construction of the FSRU and LNG carriers.

Section 4.10.1.3 contains information on California's 2005 Energy Action Plan.

#### G206-4

Section 4.4 has been updated since issuance of the October 2004 Draft EIS/EIR. Impact AES-1 discusses the visibility of the FSRU from onshore and Channel Island viewpoints. Figures 4.4-13 and 4.4-16 show simulations of views of the FSRU under clear sky conditions. Appendix F provides additional information on the visual analysis and how visibility from various distances was evaluated.

Some very slight smoke plumes or water vapor may be emitted from the natural gas-powered vessels associated with the Project, but they would be considerably less distinct than the smoke plumes from typical cargo ships burning diesel or bunker fuel.

Section 4.4.1.1 provides a description of the manner in which the offloading LNG carrier would tie up parallel to and immediately next to (side by side not end to end) the FSRU, which would have a slightly larger profile than a typical LNG carrier. At a distance of at least 12 NM (the closest point of land on the mainland), it would be difficult if not impossible to distinguish two separate vessels.

From a minimum distance of 12 NM, one could not ascribe an "industrial character" to an unidentifiable offshore object at the horizon. Viewers would naturally be inclined to assume that it is a ship due to its location in a marine environment, but details of the FSRU would not be discernible. For example, when one views the Channel Islands from a mainland viewpoint, one cannot see details on the islands (without a telescope or binoculars); only their profile and a somewhat mottled overall color caused by variation in the topography on the islands are visible.

Impact AES-2 addresses nighttime views from shore. Figure 4.4-18 shows a simulated nighttime view of the FSRU from a point on shore.

## G206-5

Sections 4.2.2, 4.2.6.1, and 4.2.7.6 contain information on the potential threat of a terrorist attack. Table 4.2-2 summarizes hazards and threats considered, including intentional events caused by shoulder or aircraft-fired missiles or other tactical weapons. As shown on Figure 2.1-2 and further summarized in Table 4.2-1, the consequences of an accident involving LNG transport by carrier and storage on the FSRU would not reach the shoreline.

Section 1.2.3 addresses natural gas needs in California and has been updated.

Sections 1.2.2, 1.2.3, 1.2.4, 3.3.1, 3.3.2, and 4.10.1.3 contain additional information on the role of renewables and conservation in relation to projected energy demands.

The proposed Project is privately funded. If the Project is not approved, the funding would not be available for Federal or State projects.

Section 1.2 discusses the Project purpose and need.

Impact ENE-2 in Section 4.10.4 discusses the beneficial impact of the proposed Project on local and regional energy supplies.

Sholly, Brian

Source:  
USCG Docket

Date: 12/17/04

From: Flynn, Louise [LFlynn@comdt.uscg.mil]  
 Sent: Monday, December 20, 2004 7:21 AM  
 To: Sholly, Brian  
 Subject: FW: the draft EIS/EIR

From: Kusano, Ken LT  
 Sent: Monday, December 20, 2004 10:14 AM  
 To: Flynn, Louise; 'dwp@comdt.uscg.mil'  
 Subject: FW: the draft EIS/EIR

V/r, KK  
 LT Ken Kusano  
 U.S. Coast Guard Headquarters  
 Deepwater Port Standards Division (G-MSO-5)  
 202-267-1184

From: Beate [mailto:beate7@copper.net]  
 Sent: Friday, December 17, 2004 9:21 PM  
 To: Kusano, Ken LT  
 Cc: ogginsc@slc.ca.gov  
 Subject: the draft EIS/EIR

Between beginning-of-the-year press dedicated to fraud charges against giant Corporations - such as the US justice department and the Securities and Exchange Commission investigation of Halliburton's payment of \$180 million in bribes to win a contract for a natural gas project in Nigeria - and an 11 November 2003 Media Background briefing called BHP: THE QUIET DECEIVER, is a lot of iffy information that should afford glaring Legend-Busting fare for the nay-sayers on the proposed BHP LNG site off our coast.

This is mostly a cut-and-past effort, but alarming all the same: Cumulative impressions of the company we want to do business with "Downer revealed that BHPB requested and received the assistance of the Australian embassy in Jakarta to pressure the Indonesian govt. to change laws that prevented the exploitation of BHP's mining lease in a protected forest area... leading to widespread human rights violations and an environmental disaster along an entire river system at its Ok Tedi mine.... BHPBilliton is seeking to establish an open cut nickel mine that would mean up to three quarters of the total landmass of the island would be turned into an open pit mine. Despite the fact that the surrounding oceans are recognized by UNESCO as containing coral reefs with the highest known marine biodiversity worldwide, BHBB is considering using the sea as a dumping ground for tailings rich in heavy metals, laden with silt and contaminated with toxic reagents from the extraction process; Tailings from the Misima mine in PNG have smothered the ocean floor over an area of approximately 20 square kilometres. In Indonesia, two mine sites are already using Submarine Tailings Disposal, causing serious health impacts in local communities, threatening food security and loss of livelihood to the local fishing communities. The waste pipes have failed on several occasions and spilled their toxic contents onto the land and into the sea...BHPB made a highly controversial exit from the mine, drafting the parliamentary law that secured it indemnification for future (I)

From BHP'S own website we have..."BHP still appears to hold the respect of most Australians despite having been involved in a range of issues w/ have generated adverse publicity. These include numerous environmental disputes

G508-1

The Applicant is required to adhere to all applicable Federal, State, and local laws, regulations, and permit requirements in the execution of all phases of the Project. Section 4.2.6 states, "The environmental and occupational safety record for the Applicant's worldwide operations, including, for example, mining ventures overseas, was not considered in evaluating potential public safety concerns associated with this Project because such operations are not directly comparable to the processes in the proposed Project." The conclusions in the EIS/EIR are based on the analyses of potential environmental impacts of the proposed Project and the implementation assumptions stated in Section 4.1.7. However, the Applicant's safety and environmental record will be taken into account by decision-makers when they consider the proposed Project.

G508-1

12/29/2004

w/ have involved some prosecutions, labour problems, sex discrimination cases, & trade practice violations."

Then we go on to the Australian Prime Minister, John Howard, meeting with Governor Schwarzenegger to discuss our proposed LNG terminal and supply deal, (LA Times:) "He said it was important the government supported the BHP-Billiton bid for the project; 'I believe it is important that the voice of the govt. be the same as BHP-Billiton.' "

Personally, I think I would be very leery of believing that corporate promises connected to a Prime Minister's lobbying can add up to anything but beneficial for them, not us. And as for our sneaky Bush Administration:

By Michael Collins, [collinsm@shns.com](mailto:collinsm@shns.com)

WASHINGTON ~ Language buried deep in [a 1,600-page] federal spending bill that Congress approved last week, says the Federal Energy Regulatory Commission can pre-empt states on the permitting and siting of LNG facilities... The LNG language was slipped into the \$388 billion spending bill during a conference committee's behind-closed-door discussions.

No one has acknowledged authorship of the provision. The final version was given to members of Congress just hours before they were to vote on it, and most probably weren't even aware the wording had been added until after they voted on the bill, Slocum said.

Alan Sanders, conservation chairman of the Los Padres chapter of the Sierra Club, said "The new language apparently would undercut not just the state Public Utilities Commission, but also the governor, the California Coastal Commission and probably, most importantly, the role of citizens in all of this. It looks like we're heading in a direction where the importance of public input is minimal at best."

Though the wording does not carry the force of law, it could seriously weaken -- and perhaps even prohibit -- state and local control over such facilities, especially if disputes over such projects wind up in court, according to environmentalists and public interest groups."

And then, who will be responsible should there be any accidents?  
From [www.upstreamonline.com](http://www.upstreamonline.com) by Dann Rogers: "Liability law 'stacked in favour of owners'.

According to the controlling law in the United States, Limitation of Vessel Owner's Liability Act, 46 U.S.C. 181, et seq., a vessel owner's liability is limited to the value of the vessel and its cargo contents remaining after a calamity occurs.

The U.S. Supreme Court has long held that where a ship sinks after a calamity, the sinking is the termination of the voyage and the value of the vessel - thus the limitation of the ship owner's liability."

A typical LNG tanker is longer than three football fields, is 12-stories high, can travel at 20 knots and requires 5 miles to halt... One tanker holds more than 33 million gallons of LNG, which equals 20 billion gallons of natural gas.

The amount of gas released from just one LNG tanker would be 20 times greater than the amount of LNG that incinerated one square mile of Cleveland in 1944..."about fifty-five Hiroshima bombs," says Brittle Power Energy Strategy for National Security...

From the Portland Press Herald, September 25, 2003: The hull and containers blocked off Smith's forward view for three-quarters of a mile, making it impossible to know for sure if other ships were in the way."

And Reflections of an LNG Skipper, Times Record 2/26/04: "Going through the Malacca Strait (between the island

G508-1  
(cont'd)

G508-2

G508-3

G508-4

G508-2

The cited legislation pertains only to LNG facilities proposed for onshore locations or locations within state waters. The proposed Project is governed safely by the provisions of the DWPA, as amended, which are administered by the USCG and MARAD.

G508-3

Section 4.2.5 contains information on the Applicant's insurance coverage and cost recovery for incidents.

G508-4

Section 4.2 and Appendix C contain additional and revised information on public safety. The worst credible case scenario modeled in the Independent Risk Assessment (Appendix C1) involved an intentional event resulting in the release of 53 million gallons (200,000 m<sup>3</sup>) of LNG to the ocean surface. Section 4.2.7.2 describes the likely potential consequences of such a scenario.

of Sumatra and Malaysia) is much harder because *there's so much traffic. I had near-collisions every time I went through there.* The prospect of hitting a large ship is a nightmare."

Coast Guard standing orders at the Savannah Port for initial action to take upon LNG discharge: 1. "Order the evacuation of all USCG personnel from affected area."  
(An explosion can cause 3rd degree burns on people 2 miles away)

**From the Norway Post:** "A fully loaded LNG tanker with a crew of 14 was Monday adrift...and the anchors were useless in the stormy weather...as the ship was only 30 yards from hitting the rocks." (didn't we just lose 30,000 gallons of oil outside Pittsburg, because the ship ran into a floating piece of metal?)

U.S. regulators don't share the concerns of the top official at the world's second-largest commercial insurer....A terrorist attack on an LNG tanker "would have the force of a small nuclear explosion," according to the chairman of Lloyd's, a British insurer of natural gas port facilities.

"Top U.S. security officials now admit that insulation in vessels is highly flammable" (Tuesday, October 12, 2004, Mobile Register) "Top officials with the Department of Homeland Security and the U.S. Coast Guard now acknowledge that ships designed to carry liquefied natural gas are, in fact, constructed using tons of highly flammable polystyrene insulation....natural gas is chilled to minus 260 degrees- turned into a liquid, takes up 600 times less space...LNG vessels require tremendous amounts of insulation in order to keep the cargo below minus 260 degrees... ensuing fire would likely destroy the polystyrene cargo insulation. A paper by the Society of International Gas Tanker and Terminal Operators states that the material was *so flammable* that dozens of shipyard workers have been killed in accidental fires during tanker construction and repair.

Havens - a former officer in the U.S. Army's chemical weapons division who is expert in biological warfare, nuclear weapons and the behavior of chemical fires - warned, "if the cargo containment insulation were to fail in a fire, I believe that the entire LNG containment could be compromised." [He] referenced a confidential study, paid for by the LNG terminal operator in Boston Harbor and produced by Lloyd's Register of Shipping, that suggests an attack on an LNG tanker with a relatively small explosive charge could lead to an escalating series of fires and explosions that would ultimately consume the ship...and cause severe burns to people within two miles of the blaze."

Writing in scientific journals and testifying before Congress, Havens has suggested the government was underestimating the public safety risks posed by an attack on an LNG vessel in a populated port area. His central criticism is that officials have never considered what would happen if all 30 million gallons on board an LNG vessel were ignited...

Capt. Dave Scott, with the Coast Guard in Washington, cautioned that protecting numerous LNG terminals in the nation's ports will require significant Coast Guard resources. Sandia National Laboratory is doing a study, but Homeland Security officials indicated in their latest letter to Massachusetts congressman Markey that they are unsure what would happen to an LNG ship in the event of a terrorist attack.

LNG creates excessive carbon monoxide emissions, burns like a "wet" gas, hotter than processed natural gas, and can damage equipment from soot - damage gas stoves, water heaters, and furnaces - and their lifespan - by as much as 50 percent - damage that also affects power plants.

Where the liquids get carried all the way to the turbines, it can damage them and shut them down & would cost approximately several hundred thousand dollars to fix PER POWER PLANT."

Full Story: [http://www.enn.com/news/2004-04-30/s\\_23344.asp](http://www.enn.com/news/2004-04-30/s_23344.asp)

Neil Crumpton, energy campaigner at Friends of the Earth Cymru said, "We think the gas plant idea should be

G508-4  
(cont'd)

G508-5

Mitigation Measure PS-1e in Section 4.2.7.6 addresses this topic. In addition, the marine safety and security requirements cited in Appendix C3, under the topic of secondary containment and thermal management, identifies International Gas Carrier (IGC) Code requirements that concern insulation.

G508-6

The Independent Risk Assessment (IRA) has been updated since issuance of the October 2004 Draft EIS/EIR. The lead agencies directed preparation of the current IRA, and the U.S. Department of Energy's Sandia National Laboratories independently reviewed it, as discussed in Section 4.2 and Appendix C.

G508-5

Section 4.2.7.6 and the IRA (Appendix C1) discuss the models and assumptions used and the verification process. Sandia National Laboratories (Appendix C2) concluded that the models used were appropriate and produced valid results.

Table 4.2-2 and Sections 4.2.6.1 and 4.2.7.6 contain information on the threat of terrorist attacks.

G508-6

G508-7

NEPA does not require "worst-case analysis" but does require the agency to prepare a summary of existing relevant and credible scientific evidence and an evaluation of adverse impacts based on generally accepted scientific approaches or research methods. However, the Independent Risk Assessment (IRA) (Appendix C1) defines and evaluates representative worst credible cases (scenarios of events that would lead to the most serious potential impacts on public safety). These included accidents that would affect one, two, or all three tanks of the FSRU.

G508-7

G508-8

As shown in Tables 4.2-1, 4.2-2, 4.2-7, and 4.2-8, the release of the contents of all three tanks (the entire contents of the FSRU and an attending LNG carrier) is addressed in the escalation scenario associated with a large intentional event. Section 4.2.7.6 contains additional information on how intentional events are addressed. Although the 2006 U.S. Department of Energy's Sandia National Laboratories third-party technical review of the 2004 IRA found that the three-tank simultaneous release (a massive LNG release in a short time period) was not credible, Sandia recommended the consideration of a cascading (escalation) three-tank scenario.

G508-9

G508-8

Table 4.2-2 and Sections 4.2.6.1 and 4.2.7.6 contain information on the threat of terrorist attacks. Section 4.2.7.6 and the Independent

Risk Assessment (Appendix C1) contain information on public safety impacts from various incidents at the FSRU. The analysis indicates that the maximum impact distance of an accident or intentional incident would involve a vapor cloud dispersion extending 6.3 nautical miles (7.3 miles) from the FSRU. The FSRU would be located approximately 12.01 nautical miles (13.83 miles) offshore; therefore, consequences of an accident or intentional incident involving LNG transport by carrier and storage on the FSRU would extend no closer than 5.7 nautical miles (6.5 miles) from the shoreline.

#### G508-9

As indicated in Section 4.6.2, the natural gas imported by the proposed Project would need to meet the requirements of Rule 30 and General Order 58-A of the California Public Utilities Commission (CPUC) or it could not be accepted for distribution by SoCalGas. Rule 30, as described, has specific requirements, including a heating value range.

Section 4.6.2 contains additional information on the regulatory setting affecting air quality and a revised discussion of the heating value of imported natural gas that incorporates the recent rulemaking by the CPUC. An analysis of the impacts of the CPUC rulemaking is beyond the scope of this document as required by NEPA and the CEQA.

turned down because of its low energy efficiency. Indeed in terms of emissions of climate changing carbon dioxide, using LNG imported from an unstable Middle East to fire combined cycle gas plants is little better than the emissions from coal burnt in new coal power station technology, and the security and safety risks are far smaller with coal.

At a time when we need to be reducing our dependence on fossil fuels from the Middle East it is a pity that old fashioned, inefficient technology such as this should be proposed."

Yet, "The global LNG industry will double in the next decade and Libya will play an important part," ...The huge tankers "Will sail under foreign flags delivering the foreign fossil fuel from Pacific Rim countries & The Middle East - including Libya, Brunei, Oman, Indonesia, Algeria, Australia, Malaysia, Nigeria, Qatar, Trinidad and Tobago..."

Shell's head of exploration and production, Malcolm Brinded, said Shell's small initial \$250 million investment could grow into something far bigger as nearby Europe turns to shipped-in liquefied natural gas to meet rising demand...

Full Story: <http://www.chron.com/cs/CDA/ssistory.mpl/business/energy/2468669>

Milton R. Copulos, president of the National Defense Council Foundation and a former member of the National Petroleum Council, says: "Last month, the National Defense Council Foundation completed its comprehensive review of the 'hidden costs' of imported oil, and the results were eye-opening. At present, they come to almost \$305 billion- more than \$1,000 for every man, woman and child living in America.

More importantly, some portion of every dollar we spend on imported oil finds its way into the hands of terrorist organizations bent on our destruction.

... to import it in the form of Liquefied Natural Gas (LNG) from the Middle East [is] a notion that would be laughable were it not being seriously considered."

FACTS: Logan Airport closes when an LNG tanker enters Boston Harbour AND The U.S. Coast Guard imposes a two-mile moving safety zone around each tanker.

I imagine you get the picture. Don't forget, there were once plans to put a nuclear power plant in these waters. Do you think there would be leukemia-filled movie stars living here? And that contaminated water in Erin Brokovitch? That leaky toxin was just over the hill, IN L.A. - did you know that? We must take control of our own futures and not cave in to corporation profit-bids. Please vote NO.

Beate Nilsen  
Malibu, CA

G508-10

G508-10

Sections 4.6.1.4 and 4.20.3.6 discuss Project emissions of greenhouse gases. The Project has been modified since issuance of the October 2004 Draft EIS/EIR. Section 4.6.1.3 contains a revised discussion of Project emissions and proposed control measures. Section 4.6.4 includes revised mitigation measures. Also, the LNG is proposed to come from Australia.

G508-11

G508-11

Section 1.2 discusses dependence on foreign energy sources, which in this case is proposed to be Australia.

G508-12

Section 4.2.7.3 and Appendix C3-2 contain information on LNG carrier security.

Impact MT-2 in Section 4.3.4 contains information on security zones for LNG carriers. As discussed, the USCG does not establish security zones for LNG carriers that are beyond 12 nautical miles (NM) from shore; the proposed LNG carrier routes are farther than 12 NM from shore.

G508-13

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

G508-12

G508-13



**From:** <Lukeamy@aol.com>  
**To:** <ogginsc@slc.ca.gov>  
**Date:** 12/6/04 6:27AM  
**Subject:** Cabrillo Port LNG Deepwater Port draft EIS/EIR

After attending the Nov.30 public hearing/open house in Oxnard, my concerns are:

1. If most of the natural gas from this project will be used in the Los Angeles area, why not build a port in Long Beach?
2. I learned from a U.S.Coast Guard rep that there are several LNG proposals under consideration in different areas. Is there some way to consider and present all of these proposals together in order to determine which ones, if any, are most suitable/most needed?
3. A massive project such as this one has a potentially dangerous impact on our area. Why would local citizens want to chance a catastrophe no matter how unlikely the risk?
4. Once an LNG Port is established, how will the local community stop future endeavors by other LNG companies to also use this Port, thereby increasing the risks?
5. Are our state and national interests best served by continuing to rely on a fossil fuel from a foreign source?
6. Are our state and national interests best served by continuing to rely on fossil fuels rather than focusing on developing renewable energy sources and conservation efforts? The argument made by some at the hearing that we can okay this project while working on developing alternative sources isn't credible considering our minimal efforts in this direction to date. Okaying this LNG project or any other only reduces the incentive to explore alternative sources and conservation methods.

Thank you for allowing me this opportunity to comment.

Grace Nishihara  
 Organization/ Agency: None  
 Street Address: 1810 Narrows Ct  
 City: Oxnard  
 State: CA  
 Zip Code: 93035  
 E-mail address: lukeamy@aol.com

G509-1

The natural gas that would be supplied by this Project would be used by the Southern California Gas Company throughout its natural gas transmission system.

Section 4.20.1.3 discusses the proposed LNG terminal at the Port of Long Beach.

G509-1

G509-2

Sections 4.20.1 and 4.20.3 describe and evaluate proposed LNG projects that are currently known.

G509-2

G509-3

Section 4.2 discusses this topic.

G509-3

G509-4

The proposed Project has a set capacity as described in Chapter 2; the Applicant has indicated that it would utilize all of the capacity.

G509-4

All LNG proposed ports in Federal waters must go through the NEPA process. Therefore, citizens have the opportunity to provide comments during the EIS scoping and comment periods, and at licensing hearings.

G509-5

G509-6

If a company other than the Applicant wanted to use Cabrillo Port, the license would have to be modified. The modification process would be similar to the original licensing process.

G509-5

Section 1.2 discusses dependence on foreign energy sources.

G509-6

Sections 3.3.1 and 3.3.2 address conservation and renewable energy sources, within the context of the California Energy Commission's 2005 Integrated Energy Report and other State and Federal energy reports, as alternatives to replace additional supplies of natural gas.



Origin: E&E Website  
Date: 12/17/2004  
First Name: Chris  
Last Name: Noriega  
Address: 1532 Edmond Dr.  
City: San Carlos  
State: CA  
Zip Code: 94070  
Topic: Environmental Justice

Comments: As a minority, I am concerned about the treatment of poor and minority communities by large corporations. Initially, I was concerned about the proposed pipeline route of the Cabrillo Port facility. The fact that it went through the City of Oxnard, which has the highest minority population in Ventura County, seemed unjust to me.

I commend BHP officials for re-routing the pipeline to stay away from Oxnard's residential population. The new route will largely avoid all residential populations, which I feel is a great step in improving the projects safety.

It is rare that a large corporation recognizes its mistakes and works with the community to find solutions to their grievances. BHP did just that and I know feel comfortable supporting this project.

G159-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

Origin: E&E Website  
Date: 12/17/2004  
First Name: Quentin  
Last Name: Norman  
Address: 2550 Highland Ave  
City: San Diego  
State: CA  
Zip Code: 92105  
Topic: Aesthetics

Comments: I have been a lifeguard for over 18 years and I know how much people enjoy a day at the beach. People don't want for their ocean views to be disrupted by unsightly off shore plants. The Cabrillo Deepwater Port will be so far out at sea, that you will barely be able to see it at all. I like that. Not only that, but they are going to paint it so that it blends into the ocean and horizon. Looks like somebody was thinking about us when they designed this project.

G123-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.